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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X M-10-993

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

BILL MANUEL ACOSTA CASTILLO,

Defendant.

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

Mark Sturtevant, being duly sworn, deposes and states that he is a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about August 28, 2010, within the Eastern District of New York and elsewhere, the defendant BILL MANUEL ACOSTA CASTILLO did knowingly and intentionally import a controlled substance into the United States from a place outside thereof, which offense involved 500 grams or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. On or about August 28, 2010, the defendant BILL MANUEL ACOSTA CASTILLO arrived at JFK International Airport in Queens, New York ("JFK") aboard Jet Blue flight No. 838 from Santiago, Dominican Republic.

2. A Customs and Border Protection ("CBP") officer approached the defendant BILL MANUEL ACOSTA CASTILLO for a routine enforcement exam. The defendant presented one suitcase for inspection and he admitted that the suitcase and its contents belonged to him.

3. The CBP officer opened the suitcase and after removing all of its contents, the CBP officer observed that the suitcase was unusually heavy. The CBP officer probed the rails of suitcase, which revealed a white powdery substance that field-tested positive for cocaine. The defendant was arrested.

4. The total approximate gross weight of the rails and the substance that tested positive for the presence of cocaine is 2146.8 grams.

^{1/} Because the purpose of this affidavit is merely to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that the defendant BILL MANUEL ACOSTA CASTILLO be dealt with according to law.



Mark Sturtevant
Special Agent
Immigration and Customs
Enforcement

Sworn to before me this
28th day of August, 2010

UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK